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Counsel to Debtors and Debtors-in-Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

**TRIDENT HOLDING COMPANY, LLC, *et al.*,
Debtors.¹**

Chapter 11

Case No. 19-10384 (SHL)

(Jointly Administered)

**AGENDA OF MATTERS SCHEDULED FOR HEARING
ON MARCH 21, 2019 AT 2:30 P.M. (PREVAILING EASTERN TIME)**

Location of Hearing: Honorable Sean H. Lane, Courtroom 701, United States
Bankruptcy Court, Southern District of New York, One Bowling
Green, New York, NY 10004

¹ The Debtors in these chapter 11 cases, along with the last four digits of their respective tax identification numbers, are as follows: Trident Holding Company, LLC (6396); American Diagnostics Services, Inc. (2771); Community Mobile Diagnostics, LLC (9341); Community Mobile Ultrasound, LLC (3818); Diagnostic Labs Holdings, LLC (8024); FC Pioneer Holding Company, LLC (6683); JLMD Manager, LLC (8470); Kan-Di-Ki LLC (6100); Main Street Clinical Laboratory, Inc. (0907); MDX-MDL Holdings, LLC (2605); MetroStat Clinical Laboratory – Austin, Inc. (4366); MX Holdings, LLC (8869); MX USA, LLC (4885); New Trident Holdcorp, Inc. (4913); Rely Radiology Holdings, LLC (3284); Schryver Medical Sales and Marketing, LLC (9620); Symphony Diagnostic Services No. 1, LLC (8980); Trident Clinical Services Holdings, Inc. (6262); Trident Clinical Services Holdings, LLC (1255); TridentUSA Foot Care Services LLC (3787); TridentUSA Mobile Clinical Services, LLC (0334); TridentUSA Mobile Infusion Services, LLC (5173); U.S. Lab & Radiology, Inc. (4988). The address of the Debtors' corporate headquarters is 930 Ridgebrook Road, 3rd Floor, Sparks, MD 21152.

Copies of Motions and
Applications:

Copies of each pleading identified below can be viewed and/or obtained by: (i) accessing the Court's website at www.nysb.uscourts.gov, (ii) contacting the Office of the Clerk of the Court at United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, NY 10004, or (iii) from the Debtors' notice and claims agent, Epiq Corporate Restructuring, LLC, at <https://dm.epiq11.com/Trident> or by calling 1-800-960-1226. Note that a PACER password is needed to access documents on the Court's website.

I. UNCONTESTED MATTERS

1. **Kilpatrick Retention**: Application of the Official Committee of Unsecured Creditors of Trident Holding Company, LLC, *et al.*, for Entry of an Order Authorizing the Employment and Retention of Kilpatrick Townsend & Stockton LLP as its Attorneys, *Nunc Pro Tunc* to February 20, 2019 [Docket No. 151] (Date Filed: 3/6/19)

Related
Documents:

- a. Certificate of No Objection to Application of the Official Committee of Unsecured Creditors of Trident Holding Company, LLC, *et al.*, for Entry of an Order Authorizing the Employment and Retention of Kilpatrick Townsend & Stockton LLP as its Attorneys, *Nunc Pro Tunc* to February 20, 2019 [Docket No. 222] (Date Filed: 3/18/19)

Objection

Deadline: March 13, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: Counsel to the Official Committee of Unsecured Creditors respectfully submits that this application may be granted in advance of a hearing. Counsel has filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the application have been received, or that all such objections or responses have been resolved.

2. **AlixPartners Retention**: Application of the Official Committee of Unsecured Creditors of Trident Holding Company, LLC, *et al.*, for Entry of An Order Authorizing the Employment and Retention of AlixPartners, LLP as its Financial Advisor, *Nunc Pro Tunc* to February 21, 2019 [Docket No. 153] (Date Filed: 3/6/19)

Related
Documents:

- a. Certificate of No Objection to Application of the Official Committee of Unsecured Creditors of Trident Holding Company, LLC, *et al.*, for Entry of an Order Authorizing the Employment and Retention of AlixPartners, LLP as its Financial Advisor, *Nunc Pro Tunc* to February 21, 2019 [Docket No. 223] (Date Filed: 3/18/19)

Objection

Deadline: March 13, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: Counsel to the Official Committee of Unsecured Creditors respectfully submits that this application may be granted in advance of a hearing. Counsel has filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the application have been received, or that all such objections or responses have been resolved.

II. CONTESTED MATTERS

3. **2004 Motion**: The Existing First Lien Agent's Motion for Entry of an Order Authorizing Document Discovery from the Debtors, Silver Point, and the Sponsors Pursuant to Bankruptcy Rule 2004 [Docket No. 154] (Date Filed: 3/6/19)

Objection

Deadline: March 13, 2019 at 4:00 p.m. (Prevailing Eastern Time), extended for the Debtors until March 14, 2019 at 11:59 p.m. (Prevailing Eastern Time).

Objections/

Responses Filed:

- a. Joinder of Official Committee of Unsecured Creditors in Existing First Lien Agent's Motion for Entry of an Order Authorizing Document Discovery from the Debtors, Silver Point, and the Sponsors Pursuant to Bankruptcy Rule 2004 [Docket No. 187] (Date Filed: 3/13/19)
- b. Objection of Welltower Inc. to the Existing First Lien Agent's Motion for Entry of an Order Authorizing Document Discovery from the Debtors, Silver Point, and the Sponsors Pursuant to Bankruptcy Rule 2004 [Docket No. 199] (Date Filed: 3/14/19)

- c. Objection of Audax Management Company, LLC to the Existing First Lien Agent's Motion for Entry of an Order Authorizing Document Discovery Pursuant to Bankruptcy Rule 2004 [Docket No. 200] (Date Filed: 3/14/19)
- d. Objection of Formation Capital, LLC to the Existing First Lien Agent's Motion for Entry of an Order Authorizing Document Discovery Pursuant to Bankruptcy Rule 2004 [Docket No. 201] (Date Filed: 3/14/19)
- e. Objection and Reservation of Rights of SPCP Group, LLC and Its Affiliates to the Existing First Lien Agent's Motion for Entry of an Order Authorizing Document Discovery From the Debtors, Silver Point, and the Sponsors Pursuant to Bankruptcy Rule 2004 [Docket No. 203] (Date Filed: 3/14/19)
- f. Objection of Revelstoke Capital Management, LLC to the Existing First Lien Agent's Motion for Entry of an Order Authorizing Document Discovery From the Debtors, Silver Point, and the Sponsors Pursuant to Bankruptcy Rule 2004 and Reservation of Rights Thereon [Docket No. 205] (Date Filed: 3/14/19)
- g. Debtors' Initial Response and Reservation of Rights With Respect to the Existing First Lien Agent's Motion for Entry of an Order Authorizing Discovery From the Debtors, Silver Point, and the Sponsors Pursuant to Bankruptcy Rule 2004 [Docket No. 206] (Date Filed: 3/14/19)
- h. Joinder of Safanad, Inc. to the Objection of Formation Capital, LLC to the Existing First Lien Agent's Motion for Entry of an Order Authorizing Document Discovery Pursuant to Bankruptcy Rule 2004 [Docket No. 217] (Date Filed: 3/18/19)
- i. Omnibus Reply in Support of the Existing First Lien Agent's Motion for Entry of Order Authorizing Discovery From the Debtors, Silver Point, and the Sponsors Pursuant To Rule 2004 [Docket No. 220] (Date Filed: 3/18/19)

Status: This matter is going forward.

- 4. **Key Employee Motion:** Debtors' Motion for Entry of an Order (I) Approving the Implementation of the Debtors' Key Employee Incentive Plan and Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 112] (Date Filed: 2/27/19)

Objection

Deadline: March 13, 2019 at 4:00 p.m. (Prevailing Eastern Time), extended for the Official Committee of Unsecured Creditors until March 14, 2019 at 11:59 p.m. (Prevailing Eastern Time).

Objections/
Responses Filed:

- a. Objection of United States Trustee to Motion for Entry of an Order (I) Approving the Implementation of the Debtors' Key Incentive Plan and Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 188] (Date Filed: 3/13/19)
- b. Reservation of Rights of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of an Order (I) Approving the Implementation of the Debtors' Key Employee Incentive Plan and Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 202] (Date Filed: 3/14/19)
- c. Debtors' Reply to Objection of the United States Trustee to Debtors' Motion for Entry of an Order (I) Approving the Implementation of the Debtors' Key Employee Incentive Plan and Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 221] (Date Filed: 3/18/19)

Status: This matter is going forward.

Dated: March 19, 2019
New York, New York

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

/s/ Jason N. Kestecher

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